

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND EXCHANGE COMMISSION	:	
	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
STEFAN QIN, VIRGIL TECHNOLOGIES LLC, MONTGOMERY TECHNOLOGIES LLC, VIRGIL QUANTITATIVE RESEARCH, LLC, VIRGIL CAPITAL LLC, and VQR PARTNERS LLC,	:	
	:	
Defendants.	:	
	:	
	:	
	:	

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S
EX PARTE EMERGENCY MOTION
FOR AN ASSET FREEZE AND OTHER RELIEF**

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Amanda Straub (AS0516)
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* Motion for *pro hac vice* pending

Plaintiff Securities and Exchange Commission (the “Commission”) hereby moves the Court, on an *ex parte* emergency basis, for an order freezing assets and for other emergency relief, including an order to show cause, against defendants Virgil Capital LLC, Montgomery Technologies, LLC, Virgil Technologies, LLC, Virgil Quantitative Research, LLC and VQR Partners, LLC, (collectively, “Entity Defendants”), to prevent the further dissipation or expatriation of investor assets.

This motion is made pursuant to Sections 20(b) and 20(d)(1) of the Securities Act of 1933 [15 U.S.C. §§ 77t(b) and 77t(d)(1)], and Section 21(d)(1) of the Securities Exchange Act of 1934 [15 U.S.C. § 78u(d)(1)], Rule 65 of the Federal Rules of Civil Procedure, and Local Civil Rule 6.1, and is supported by the Complaint, a Proposed Order, the Declaration of Fitzann R. Reid pursuant to Local Rule 6.1(d) and in support of the motion with attached exhibits; the Memorandum of Law and the Declarations of Antonio Hallak, Carey Harrold, Melissa Fox Murphy, and Amanda L. Straub, with their attached exhibits.

The Commission seeks an order (1) freezing the assets that are owned by, or under the control of, Entity Defendants, (2) requiring an accounting by Entity Defendants of investor assets, (3) permitting immediate discovery of documents from Entity Defendants and from third parties, and (4) preventing Entity Defendants from destroying or altering documents.

As described in the Memorandum of Law and the Declaration of Fitzann R. Reid pursuant to Local Rule 6.1(d), the Commission makes this motion on an emergency *ex parte* basis; however, the Commission has made efforts to alert counsel identified as representing the Entity Defendants and separate counsel representing Defendant Stefan Qin in another government investigation.

For the reasons stated in the Commission’s Memorandum of Law and above, the Commission therefore asks that its emergency motion be granted and that an Order in the form of that attached to this filing be entered by the Court.

Dated: December 22, 2020

/s/ Fitzann R. Reid

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